

Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

DAI TRONG TRAN, et al.,

Defendant.

NO. CR07-0118 MJP

STIPULATED MOTION TO
CONTINUE MOTIONS DEADLINE

United States of America, through Lisca Borichewski, Assistant United States Attorney ("Plaintiff") and defendant, Dai Trong Tran, stipulate, upon request of Defendant Tran, to continue the pretrial motions deadline in this matter, currently set for April 26, 2007, to May 17, 2007.

In support of this request for continuance the parties respectfully request that the Court consider the following:

1. This matter has not been continued.
2. This is a multi-defendant case alleging conspiracies to import and distribute marijuana and to engage in money laundering.

STIPULATED MOTION

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ORDER

This matter comes before the Court on a stipulated motion by the parties to continue the pretrial motions due date and the trial date, and the Court having considered the entirety of the record and files herein, the Court finds as follows:

1. This case is both unusual and complex. Failure to grant the requested continuances would likely result in a miscarriage of justice.
2. The Court finds that it is unreasonable for defense counsel to complete review of the discovery and to adequately prepare any pretrial motions by the original cut-off date.
3. The Court further finds that the interests of the public and the defendant in a speedy trial in this case are outweighed by the ends of justice. Now, therefore,

IT IS HERBY ORDERED that the pretrial motions due date be continued from April 26, 2007 to _____, 2007.

Done this _____ day of April, 2007.

HONORABLE MARSHA J. PECHMAN
UNITED STATES DISTRICT JUDGE

Presented by:

s/ Jeffrey Steinborn, PLLC
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 26th day of April, 2007, I electronically filed the foregoing Stipulated Motion with the clerk of the court using the CM/ECF system which will send notification of such filing to the attorney(s) of record for the defendant(s). I hereby certify that I have served any other parties of record that are non CM/ECF participants via Tele-fax/US postal mail.

Dated this 26th day of April, 2007.

s/

Tracee Tomich, Legal Assistant
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